

## **Consolidated Plan Improvement Initiative**

### **Consortia Working Group**

#### **Summary of Ideas**

The purpose of this submission is to summarize the meaningful ideas generated by the Consortia Working Group as part of the ConPlan Improvement Initiative. These ideas are being forwarded to the CPIO Steering Committee with the ultimate objective of forwarding to HUD's Assistant Secretary of Community Planning and Development for consideration and possible action. These ideas relate to changes that may be administrative, regulatory or statutory in nature to the ConPlan and related plans and reports.

#### **Working Group Profile**

Co-Chairs: Robert Goulka (HUD HQ, Office of Affordable Housing Programs), Tom Laurin ( San Bernardino Co., CA).

Active Members: Scott Cleveland ( HUD Field Office, Boston, MA), Ed Gramlich (Center for Community Change), Ernest Hopkins (San Francisco AIDS Foundation), Kevin Hurley (City of Peabody, MA), Terry Manning (South Florida Regional Planning Council), Doug Payne (San Bernardino Co., CA), Mike Rawson (California Affordable Housing Law Project).

Meeting Dates: Conference calls were held on July 3 and 22, August 5 and 15<sup>th</sup> and September 5.

ComCon Staff: Grace Morris

#### **Fast Track Ideas**

**1. Longer period of time to complete the CAPER.** Discussion: Most Grantees felt that 90 days is not a sufficient amount of time for completing the CAPER. They suggest 120 to 150 days. Grantees also feel it is unnecessary to submit IDIS print outs with the CAPER since HUD already has all of the information in the system.

**2. Stop "encouraging" the use of *Community 2020*.** Discussion: Many Grantees feel it is useless and are frustrated because they have to set a side a computer on which to run *2020* since it is not compatible with today's operating systems. Grantees can set-up projects in IDIS without using *2020*.

## **Pilot Recommendations and Ideas**

**1. Utilize other plans.** Discussion: Specifically this group was interested in seeing if the Continuum of Care could be utilized to address the homeless needs section of the ConPlan. See discussion under General Ideas below.

**2. Alternative ways to meet the CD Non-Housing Plan requirement.** Discussion: Many felt that the CD Non-Housing Plan was not really a vital component to the ConPlan especially for Consortia. They would like to find ways to make it more useful since it is required by statute.

**3. Matrix.** Discussion: San Bernardino Co., CA., has developed a matrix which outlines the regulatory and statutory requirements and then shows where to locate those items in their ConPlan. Such a crosswalk makes the ConPlan more useful to citizens and the HUD Field Office staff. This would be a pilot of an existing activity which could be easily transferred to other communities and evaluated.

## **Performance Measurement Issues and Recommendations**

**1. HUD utilize existing information.** Discussion: Consortia Group felt strongly that the Grantees already supply HUD with a vast amount of information on their activities including the information in IDIS. It is felt that HUD needs to utilize the information more effectively to meet its own reporting needs.

**2. HUD change the questions.** Discussion: Consortia group felt that they have all important information available on their projects. HUD needs to change the reporting systems so that the Grantees input data/information in a way that captures it in a useable format for outputs/reports.

## **Technology**

**1. New products.** Discussion: Members would like to see a web-based system which connects the ConPlan, Annual Plan, IDIS and CAPER but they feel this is probably too much to expect from HUD. At this point, members would like to see continuing improvements made to IDIS and the elimination of 2020.

**General Ideas** (Items discussed extensively but upon which consensus was not fully achieved)

**1. Alternative Plans.** Discussion: Grantees would like HUD to consider allowing them to use their existing Continuum of Care plans for the homeless needs sections of ConPlan. Many in the group felt this would go a long way towards streamlining the plan. However, some advocates had concerns about the ability of low-income citizens to piece separate documents together. Concern was expressed that there would be something so brief in the ConPlan that it would not serve a purpose.

**2. Request that HUD provide communities with data in a more timely and accurate fashion and that HUD clarify the use of locally developed data.** Discussion: Grantees appreciate that they receive the data they are to use from HUD but expressed concerns because census data becomes outdated so quickly. Grantees worry that they may be expected to perform surveys etc., in order to have more recent data available to them.

Advocates are concerned with just using census because again it is dated information. Advocates also expressed apprehension because they have experienced resistance from communities who are not willing to accept locally generated data - not because of source reliability issues but it is felt the communities resist because they do not want to amend their ConPlan to conform with the information provided by the new study. The section dealing with housing needs in the ConPlan says "housing data included in this portion of the plan shall be based on U.S. census data, as provided by HUD, as updated by any properly conducted local study, or any other reliable source that the jurisdiction clearly identifies."

**3. Citizen Participation.** Discussion: This was a heavily debated topic. The Consortia members expressed the feeling that the public comment period produces little feedback and should be reduced. For the most part their public hearings are poorly attended. It makes no sense to host them. Many Consortia require the participating communities to hold hearings so by the time it gets up to the Consortia level there is not much to discuss.

Advocates would like to see the public comment period extended and for there to be some type of incentive from HUD for Grantees to go above the minimum requirements. It was felt by others that Grantees are in fact already doing more than the minimum without improved results. Grantees also feel that citizen input exists throughout the process and that these additional requirements really do not lead to meaningful input.

## **Conclusion**

As the Summary above indicates, it was not always easy to reach consensus among the membership of the Consortia Working Group due to the diversity of participants. This provided for a variety of opinions and experiences which made for lively and interesting discussions.

Specifically in the area of Performance Measurement, the group felt strongly that Grantees are already supplying HUD with more than enough information to determine the effectiveness of the programs, especially CDBG.

Overall the Grantees are concerned that changes will add work for them. They are already having a hard time keeping up with the existing required plans and reports. Advocates were concerned that streamlining meant making things easier on Grantees by reducing the requirements rather than making the process more efficient and effective.